

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

Approved by OMB
3060-0589
Page 1 of 1

(1) LOCKBOX # 358145		FCC/MELLON		OCT 19 2005		SPECIAL USE ONLY	
						FCC USE ONLY	
SECTION A - PAYER INFORMATION							
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) LAW OFFICES OF THOMAS K. CROWE, P.C.				(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$895.00			
(4) STREET ADDRESS LINE NO. 1 1250 24th STREET, NW							
(5) STREET ADDRESS LINE NO. 2 SUITE 300							
(6) CITY WASHINGTON				(7) STATE DC	(8) ZIP CODE 20037		
(9) DAYTIME TELEPHONE NUMBER (include area code) 202- 263-3640				(10) COUNTRY CODE (if not in U.S.A.)			
FCC REGISTRATION NUMBER (FRN) REQUIRED							
(11) PAYER (FRN) 003716172				(12) FCC USE ONLY			
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET							
(13) APPLICANT NAME MASKINA COMMUNICATIONS, INC.							
(14) STREET ADDRESS LINE NO. 1 8445 FREEPORT PARKWAY							
(15) STREET ADDRESS LINE NO. 2 SUITE 650							
(16) CITY IRVING				(17) STATE TX	(18) ZIP CODE 75603		
(19) DAYTIME TELEPHONE NUMBER (include area code) 972-607-4761				(20) COUNTRY CODE (if not in U.S.A.)			
FCC REGISTRATION NUMBER (FRN) REQUIRED							
(21) APPLICANT (FRN) 0013459243				(22) FCC USE ONLY			
COMPLETE SECTION C FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET							
(23A) CALL SIGN/OTHER ID		(24A) PAYMENT TYPE CODE CUT		(25A) QUANTITY 1			
(26A) FEE DUE FOR (PTC) \$895.00		(27A) TOTAL FEE \$895.00		FCC USE ONLY			
(28A) FCC CODE 1		(29A) FCC CODE 2					
(23B) CALL SIGN/OTHER ID		(24B) PAYMENT TYPE CODE		(25B) QUANTITY			
(26B) FEE DUE FOR (PTC)		(27B) TOTAL FEE		FCC USE ONLY			
(28B) FCC CODE 1		(29B) FCC CODE 2					
SECTION D - CERTIFICATION							
CERTIFICATION STATEMENT I, <u>Thomas Crowe</u> , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.							
SIGNATURE <u>Thomas Crowe</u>				DATE <u>10/19/05</u>			
SECTION E - CREDIT CARD PAYMENT INFORMATION							
MASTERCARD _____ VISA _____ AMEX _____ DISCOVER _____							
ACCOUNT NUMBER _____				EXPIRATION DATE _____			
I hereby authorize the FCC to charge my credit card for the service(s)/authorization herein described.							
SIGNATURE _____				DATE _____			

SEE PUBLIC BURDEN ON REVERSE

FCC FORM 159

FEBRUARY 2003 (REVISED)

LAW OFFICES OF THOMAS K. CROWE, P.C.

1250 24th STREET, N.W.
SUITE 300
WASHINGTON, D.C. 20037

TELEPHONE (202) 263-3640
FAX (202) 263-3641
E-MAIL firm@tkcrowe.com

October 19, 2005

BY HAND DELIVERY

Ms. Marlene Dortch
Secretary
Federal Communications Commission
Wireline Competition Bureau – CPD – 214 Appls.
P.O. Box 358145
Pittsburgh, PA 15251-5145

Re: Domestic Application for Consent to Transfer Control of a Domestic Carrier

Dear Secretary Dortch:

Pursuant to Section 214 of the Communications Act of 1934, as amended and Section 63.04 of the Commission's Rules, please find enclosed an original and five (5) copies of Maskina Communications, Inc.'s Domestic Application for Consent to Transfer Control of a Domestic Carrier. Also enclosed is a completed FCC Form 159 and a check payable to "FCC" in the amount of \$895.00.

Please acknowledge receipt of this filing by file-stamping and returning the extra copy of this application in the self-addressed, stamped envelope provided for this purpose. Should you require further information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas K. Crowe", with a large, stylized initial "T" and "C".

Thomas K. Crowe,
Counsel for Maskina
Communications, Inc.

Enclosure
cc: Renee Crittendon, WCB

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
MASKINA AS)	
)	
Transferee,)	
)	
TRANSCOM HOLDINGS, LLC)	File No. _____
)	
Transferor,)	
)	
Application Pursuant to Section 214)	WC Docket No. _____
of the Communications Act of 1934,)	
as amended, and Section 63.04 of the)	
Commission's Rules for Consent to)	
the Transfer of Control of Maskina)	
Communications, Inc. to Maskina AS)	

**DOMESTIC APPLICATION FOR CONSENT TO TRANSFER CONTROL OF A
DOMESTIC CARRIER**

Pursuant to 47 C.F.R. § 63.04(a) (2004), the following information is intended to fulfill the requirements for application to transfer ownership control of a domestic carrier. Maskina Communications, Inc. ("Maskina Communications" or "Applicant") seeks Federal Communications Commission ("Commission") approval to transfer control of Maskina Communications from Transcom Holdings, LLC to Maskina AS.¹ As required by Section 63.04(a) of the Commission's Rules, Applicant submits the following information:

(1) Applicant Name, Address and Telephone Number

Licensee:
Maskina Communications, Inc.

¹ Note that the transaction for which Maskina Communications seeks consent closed on December 2, 2004, as discussed more fully below.

8445 Freeport Parkway, Suite 650
Irving, TX 75063
Phone: 972-607-4761

Transferor:
Transcom Holdings, LLC
Carolyn Malone
Executive Vice President of
Administration and Human Resources
1925 West John Carpenter Freeway
Suite 500
Irving, TX 75063
Phone: 972-792-3700

Transferee:
Maskina AS
Kjetil Bohn
Chief Executive Officer
Arbins Gate 11
N-0253
Oslo, Norway
Phone: 47 23 08 66 66

(2) Incorporation

Maskina Communications is incorporated under the laws of Texas. Maskina AS is organized under the laws of Norway. Transcom Holdings, LLC is organized under the laws of Texas.

(3) Officer or Contact Point

Thomas K. Crowe
Counsel
Law Offices of Thomas K. Crowe, P.C.
1250 24th St., NW, Suite 300, Washington, D.C. 20037
Phone: (202) 263-3640
Fax: (202) 263-3641
Email: firm@tkcrowe.com

(4) Ownership

Ownership information is provided below for Maskina Communications at the time of the December 2, 2004 transaction (*see* No. 6 below) as well as ownership information as of the date of this filing.

A. Ownership on December 2, 2004

Immediately following the transfer on December 2, 2004, the following entity held a ten percent (10%) or greater direct ownership/voting interest in Maskina Communications:

<u>Name/Address</u>	<u>% of Interest</u>	<u>Citizenship</u>	<u>Principal Business</u>
Maskina AS Arbins Gate 11 N-0253 Oslo, Norway	100%	Norway	Telecommunications

On December 2, 2004, the following individuals held a ten percent (10%) or greater indirect ownership/voting interest in Maskina Communications through ownership of Maskina AS:

<u>Name/Address</u>	<u>% of Interest</u>	<u>Citizenship/ Place of Incorporation</u>	<u>Principal Business</u>
Jan Christian Berger Lammersgate 52 3014 Drammen Norway	13.54%	Norway	Telecommunications
Kjetil Bohn Emanuels Vei 14 1366 Lysaker Norway	12.93%	Norway	Telecommunications
Transcom Holdings, LLC 1925 West John Carpenter Freeway Suite 500 Irving, TX 75063	16.97%	U.S. (Texas)	Telecommunications

No other entity or individual owned more than a 10% interest in Maskina AS.

B. Current Ownership

The following entity currently holds a ten percent (10%) or greater direct ownership/voting interest in Maskina Communications:

<u>Name/Address</u>	<u>% of Interest</u>	<u>Citizenship</u>	<u>Principal Business</u>
Maskina AS Arbins Gate 11 N-0253 Oslo, Norway	100%	Norway	Telecommunications

The following entity currently holds a ten percent (10%) or greater indirect ownership/voting interest in Maskina Communications through ownership of Maskina AS:

<u>Name/Address</u>	<u>% of Interest</u>	<u>Citizenship</u>	<u>Principal Business</u>
Tower PLC 79 Tonbridge Road Hildenborough, Kent TN11 9BH United Kingdom	100%	UK	Telecommunications

No single entity or individual owns more than a 10% interest in Tower PLC (a publicly traded company). Tower PLC obtained an indirect interest in Maskina Communications through a pro forma transfer of control which occurred on June 27, 2005 which is discussed more fully below.²

(5) Anti-Drug Abuse Act Certification

See Attachment 1.

(6) Description of the transaction:

On December 2, 2004, Maskina AS purchased a 100% ownership interest in Maskina Communications (f/k/a Transcom Communications, Inc.) from Transcom Holdings, LLC. Maskina

² Note that at the time of the *pro forma* transfer of control from Maskina AS to Tower PLC, 10.59% of the shares of Tower PLC were held by Griffin Group PLC, a publicly traded UK financial services company with an address at Hilden Park House, 79 Tonbridge Road, Hildenborough, Kent, TN11 9BH. Griffin Group PLC has since divested itself of a sufficient interest in Tower PLC so as to fall below a 10% attributable indirect interest in Maskina Communications.

Communications changed its name from Transcom Communications, Inc. effective January 11, 2005. On April 5, 2005, Transcom Communications, Inc. filed a notice with the Commission informing the Commission that it had adopted the name "Maskina Communications, Inc."

In addition, on June 27, 2005, Tower PLC acquired 100% of the shares of Maskina AS, and therefore, a 100% indirect interest in Maskina Communications.³

- (7) **A description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area:**

Neither the Transferor nor Transferee directly offers telecommunications service. The Transferee is affiliated with Maskina Communications, which offers wholesale interexchange service throughout the U.S. Maskina Communications provides service through resale agreements with underlying facilities-based carriers and through switching equipment owned by the Applicant.

- (8) **A statement as to how the application fits into one or more of the presumptive streamlined categories in section 63.03 or why it is otherwise appropriate for streamlined treatment:**

Since Maskina Communications has a share of less than 10 percent of the interstate, interexchange market, provides services exclusively in areas served by dominant local exchange carriers that are not a party to the transaction and neither party (to either transaction discussed above)

³ The second transfer is considered *pro forma* because the ultimate ownership or control with respect to Maskina Communications was held, before and after the transfer, by the same group of shareholders. Prior to June 27, 2005, Maskina Communications was wholly owned by Maskina AS. At that time, Maskina AS was controlled by a group of approximately 66 shareholders. As a result of the transaction consummated on June 27, 2005, a 100% ownership interest in Maskina AS was conveyed to Tower PLC. As part of the transaction, the group of shareholders which previously owned 100% of Maskina AS were issued shares in Tower PLC (a publicly traded company) such that the former Maskina AS shareholders held 67.08% of the ownership in Tower PLC. This transaction is considered a reverse take-over or reverse merger. Thus, although a new company, Tower PLC, assumed indirect control over Maskina Communications on June 27, 2005, the single group of shareholders which indirectly controlled Maskina Communications prior to the transaction continued to own an indirect, controlling interest in Maskina Communications after the transaction, through ownership of Tower PLC.

is dominant with respect to any service, streamlined processing is appropriate under 47 C.F.R. § 63.03(b)(2)(i).

(9) Identification of all other Commission applications related to the same transaction:

On May 31, 2005, Maskina Communications filed an Application for Consent to Transfer Control of Maskina Communications (ITC-T/C-20050621-00232) from Transcom Holdings, LLC to Maskina AS regarding Maskina Communications' International Section 214 authority. Additionally, an application for Special Temporary Authority (STA) to operate under Maskina Communications' International Section 214 authority (ITC-STA-20050926-00380) was filed on September 26, 2005.⁴ On October 6, 2005, a notification of the *pro forma* transfer of control of Maskina Communications (ITC-T/C-20051006-00397) from Maskina AS to Tower PLC (International Section 214 authority) was filed.⁵

(10) A statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure:

None of the parties to the application are requesting special consideration due to imminent business failure.

(11) Identification of any separately filed waiver requests being sought in conjunction with the transaction:

No separately filed waiver requests have been filed; however, waivers have been requested to the extent necessary to obtain approval of the applications referenced in response to Item 9 above.

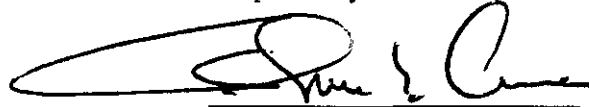
⁴ Note that Applicant does not intend to file an application for STA in conjunction with this application because although Maskina Communications provided service to end users on December 2, 2004, the date of the initial closing, as of March 2005, such customers no longer receive service from Maskina Communications. Currently, Maskina Communications provides service solely as a wholesale provider. Maskina Communications does not own or lease transmission lines.

⁵ See Attachment 2.

- (12) **A statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets:**

Maskina Communications is a wholesale telecommunications services provider, providing service to end user customers of companies other than Maskina Communications. Many of the companies which rely on Maskina Communications for wholesale service provide service to end users on a prepaid basis. Such consumers often have lower incomes and fewer options available for the purchase of telecommunications service than options which may be available to the public at large. Maskina Communications' service serves the public convenience and necessity by providing options to those lower income consumers, which increases competition and reduces prices.

Respectfully submitted,



Thomas K. Crowe
Gregory E. Kunkle
LAW OFFICES OF THOMAS K.
CROWE, P.C.
1250 24th St., NW, Suite 300
Washington, D.C. 20037
Phone: (202) 263-3640

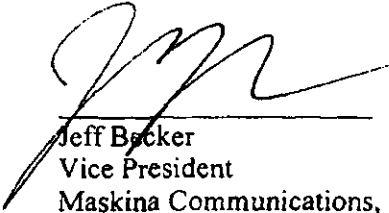
COUNSEL FOR MASKINA
COMMUNICATIONS, INC.

October 19, 2005

ATTACHMENT 1

CERTIFICATION

On behalf of Maskina Communications, Inc. and in accordance with Sections 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003 (2004), I hereby certify that neither Maskina Communications, Inc., its officers and directors, nor any party with a five percent or greater interest in Maskina Communications, Inc., is subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. *See* 21 U.S.C. § 853 (2004). I also certify under the laws of the United States of America that, under penalty of perjury, I have reviewed the attached Domestic Application for Consent to Transfer Control ("Application") of a Domestic Carrier, and that, to the best of my knowledge and belief, all of the information contained in the Application, as amended, is accurate and correct. Executed on 10/14/05.




Jeff Becker
Vice President
Maskina Communications, Inc.

CERTIFICATION

On behalf of Transcom Holdings, LLC and in accordance with Sections 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003 (2004), I hereby certify that neither Transcom Holdings, LLC, its officers and directors, nor any party with a five percent or greater interest in Transcom Holdings, LLC, is subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. *See* 21 U.S.C. § 853 (2004). I also certify under the laws of the United States of America that, under penalty of perjury, I have reviewed the attached Domestic Application for Consent to Transfer Control ("Application") of a Domestic Carrier, and that, to the best of my knowledge and belief, all of the information contained in the Application, as amended, is accurate and correct. Executed on

10/14/05.


Carolyn Malone
Executive Vice President of
Administration and Human
Resources
Transcom Holdings, LLC

CERTIFICATION

On behalf of Maskina AS and in accordance with Sections 1.2001-1.2003 of the Commission's Rules, 47 C.F.R. §§ 1.2001-1.2003 (2004), I hereby certify that neither Maskina AS, its officers and directors, nor any party with a five percent or greater interest in Maskina AS, is subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988. See 21 U.S.C. § 853 (2004). I also certify under the laws of the United States of America that, under penalty of perjury, I have reviewed the attached Domestic Application for Consent to Transfer Control ("Application") of a Domestic Carrier, and that, to the best of my knowledge and belief, all of the information contained in the Application, as amended, is accurate and correct. Executed on 17.10.2005.



Kjetil L. Bohn
Chief Executive Officer
Maskina AS

ATTACHMENT 2

Approved by OMB
3060-0686

INTERNATIONAL SECTION 214 AUTHORIZATIONS FOR ASSIGNMENT OR TRANSFER OF CONTROL FCC 214 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Pro Forma Transfer of Control of Maskina Communications, Inc.

1. Legal Name of Applicant

Name:	Maskina Communications, Inc.	Phone Number:	972-830-3240
DBA Name:		Fax Number:	972-889-2863
Street:	8445 Freeway Parkway Suite 650	E-Mail:	
City:	Irving	State:	TX
Country:	USA	Zipcode:	75063 -
Attention:	Mr Jeff Becker		

2. Name of Contact Representative

Name:	Thomas K. Crowe	Phone Number:	202-263-3640
Company:	Law Offices of Thomas K. Crowe, P.C.	Fax Number:	202-263-3641
Street:	1250 24th St., NW Suite 300	E-Mail:	firm@tkcrowe.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20037-
Attention:	Thomas K. Crowe	Relationship:	Legal Counsel

CLASSIFICATION OF FILING

3. Choose the button next to the classification that best describes this filing. Choose only one.

☐ a. Assignment of Section 214 Authority

An Assignment of an authorization is a transaction in which the authorization, or a portion of it, is assigned from one entity to another. Following an assignment, the authorization will usually be held by an entity other than the one to which it was originally granted. (See Section 63.24(b).)

☐ b. Transfer of Control of Section 214 Authority

A Transfer of Control is a transaction in which the authorization remains held by the same entity, but there is a change in the entity or entities that control the authorization holder. (See Section 63.24(c).)

☐ c. Notification of Pro Forma Assignment of Section 214 Authority (No fee required)

☒ d. Notification of Pro Forma Transfer of Control of Section 214 Authority (No fee required)

Date of Consummation: Must be completed if you select c or d.

4. File Number(s) of Section 214 Authority(ies) for Which You Seek Consent to Assign or Transfer Control.

Note: If the Section 214 Authorization Holder whose authority is being assigned or transferred does not have an "ITC" File No. under which it is operating, contact the Help Desk for assistance before proceeding further with this application. You cannot enter an "ITC-ASG" or "ITC-T/C" File No. in response to this question. Your response must specify one or more "ITC" File Nos. Relevant "ITC-ASG" or "ITC-T/C" File Nos. should be listed only in Attachment 1 in response to Question 10.

File Number:IT	File Number:	File Number:	File Number:	File Number:	File Number:	File Number:	File Number:
C214200210310 0534							

5. Name of Section 214 Authorization Holder

Name:	Mr Jeff Becker	Phone Number:	972-830-3240
DBA Name:		Fax Number:	972-889-2863
Street:	8445 Freeway Parkway Suite 650	E-Mail:	
City:	Irving	State:	TX
Country:	USA	Zipcode:	75063
Attention:	Mr Jeff Becker		

6. Name of Assignor / Transferor

Name:	Mr Kjetil Bohn	Phone Number:	4723086665
DBA Name:	Maskina AS	Fax Number:	
Street:	Arbins Gate 11 Oslo	E-Mail:	
City:		State:	
Country:	NOR	Zipcode:	-
Attention:	Mr Kjetil Bohn		

7. Name of Assignee / Transferee

Name:	Tower PLC	Phone Number:	4723086672
DBA Name:		Fax Number:	
Street:	79 Tonbridge Rd. Hildenborough	E-Mail:	
City:		State:	
Country:	GBR	Zipcode:	-
Attention:	Mr Hans-Arne L'orange		

8a. Is a fee submitted with this application?

- ☐ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
☐ Governmental Entity ☐ Noncommercial educational licensee ☒ Notification of Pro Forma (No fee required.)
☐ Other (please explain):

8b. You must file a separate application for each legal entity that holds one or more Section 214 authorizations to be assigned or transferred.

Fee Classification CUT - Section 214 Authority

9. Description (Summarize the nature of the application.)

(If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Notification of a pro forma transfer of control of Maskina
Communications, Inc. from Maskina AS to Tower PLC.

10. In Attachment 1, please respond to paragraphs (c) and (d) of Section 63.18 with respect to the assignor/transferor and the assignee/transferee.
Label your response "Answer to Question 10".

11. Does any entity, directly or indirectly, own at least ten (10) percent of the equity of the assignee/transferee as determined by successive multiplication in the manner specified in the note to Section 63.18(h) of the rules? ☐ Yes ☒ No

If you answered "Yes" to this question, provide in Attachment 1, the name, address, citizenship, and principal businesses of each person or entity that directly or indirectly owns at least ten (10) percent of the equity of the assignee/transferee, and the percentage of equity owned by each of those persons or entities (to the nearest one percent). Label your response "Answer to Question 11."

12. Does the assignee/transferee have any interlocking directorates with a foreign carrier?

☐ Yes ☒ No

If you answered "Yes" to this question, identify each interlocking officer/director in Attachment 1. (See Section 63.09(g).) Provide the name and position/title of the individual or entity, the name of the foreign carrier, and the country in which the foreign carrier is authorized to operate. Label your response: "Answer to Question 12."

13. Provide in Attachment 1 a narrative of the means by which the proposed assignment or transfer of control will take place. In circumstances of a substantial assignment or transfer of control pursuant to Section 63.24(e), where the assignor seeks authority to assign only a portion of its U.S. international assets and/or customer base, please specify whether the assignor requests authority to continue to operate under any or all of its international Section 214 File Nos. after consummation; and, if so, please specify in Attachment 1 each File No. it seeks to retain in its own name. Label your response "Answer to Question 13."

Note: The assignor may retain any or all of its international Section 214 File Nos. In that case, the assignor will continue to hold the international section 214 authorizations that it specifies in response to this question. The ITC-ASG File No. that the Commission assigns to this application will, when granted, constitute Commission authorization of the proposed assignment of assets and /or customers from the assignor to the assignee. Unless Commission grant of the assignment application specifies otherwise, the assignee may provide the same services on the same routes as permitted under the assignor's Section 214 authorization(s), and the assignee may provide such service to any customers it may obtain in the ordinary course of business.

If this filing is not a notification of a pro forma assignment or pro forma transfer of control, please respond to Questions 14-20 below. (See Section 63.24(d).) Otherwise, you may proceed to Question 21 below.

14. Check "Yes" below if the assignee is a foreign carrier or if, upon consummation of the proposed assignment or transfer of control, the Section 214 holder would be affiliated with a foreign carrier. (See Section 63.18 (i).) The terms "foreign carrier" and "affiliated" are defined in Section 63.09 (d) & (e) of the rules respectively. ☐ Yes ☐ No

If you answered "Yes" to this question, please specify in Attachment 1 each foreign country in which the assignee is a foreign carrier or in which the Section 214 holder, upon consummation, would be affiliated with a foreign carrier. Label your response, "Answer to Question 14."

15. If this application is granted and the proposed assignment or transfer is consummated, would the Section 214 holder be authorized to provide service to any destination country for which any of the following statements is true? ☐ Yes ☐ No

- (1) The Section 214 holder is a foreign carrier in that country; or
- (2) The Section 214 holder controls a foreign carrier in that country; or
- (3) Any entity that owns more than 25 percent of the Section 214 holder, or that controls the Section 214 holder, controls a foreign carrier in that country.
- (4) Two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Section 214 holder and are parties to, or the beneficiaries of, a contractual relation (e.g., a joint venture or market alliance) affecting the provision or marketing of international basic telecommunications services in the United States.

If you answered "Yes" to this question, please specify in Attachment 1 each foreign carrier and country for which any of the above statements would be true. Label your response, "Answer to Question 15."

16. If you answered "Yes" to question 14, do you request classification of the Section 214 holder as a "non-dominant" carrier, upon consummation of the proposed transaction, between the United States and any or all countries listed in response to Question 14? See Section 63.10 of the rules.

☐ Yes ☐ No

If you answered "Yes" to this question, you must provide information in Attachment 1 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination country route where it would be a foreign carrier, or would be affiliated with a foreign carrier and for which you request non-dominant classification. Label your response, "Answer to Question 16."

17. If you answered "Yes" to question 14 and you have not provided information in response to Question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules on each U.S.-destination route where it would be a foreign carrier, or be affiliated with a foreign carrier, check "Yes" below to certify that the assignee/transferee agrees to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in the provision of international service between the United States and any foreign country(ies) for which you have not provided the required information.

☐ Yes, I certify that I agree to comply with the dominant carrier safeguards in Section 63.10 (c) & (e) of the rules in my provision of international service between the United States and the following foreign country(ies):

☐ No, Does not apply.

18. If you answered "Yes" to question 15, and if you have not provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10 of the rules in its provision of service to each of the countries identified in response to question 15, the Section 214 holder may not be eligible to provide international telecommunications service between the U.S. and each such country following consummation of the assignment or transfer. In order to determine whether the public interest would be served by authorizing service on these U.S.-destination country routes, the assignee/transferee must provide information, in Attachment 1, to satisfy one of the showings specified in Section 63.18(k) of the rules. Label your response, "Answer to Question 18."

19. If the assignee, or the Section 214 holder that is the subject of this transfer of control application, is a provider of Commercial Mobile Radio Services, you need not answer this question.

If any of the Section 214 authorization(s) that would be assigned or transferred, authorize the Section 214 holder to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to a country listed in response to question 14, and unless you have provided information in response to question 16 to demonstrate that the Section 214 holder would qualify for non-dominant classification under Section 63.10(a)(3) of the rules for each country, check "Yes" below to certify that the assignee/transferee will file the quarterly traffic reports required by Section 43.61(c) of the rules; and/or state in Attachment 1 that the foreign carrier(s) for which the applicant has not made a showing under Section 63.10(c)(3) do(es) not collect settlement payments from U.S. international carriers. (See Section 63.18(l).)

☒ Yes, I certify that I agree to comply with the quarterly traffic reporting requirements set forth in section 43.61(c) of the rules.

20. If the applicant desires streamlined processing pursuant to Section 63.12 of the rules, provide in Attachment 1 a statement of how the application qualifies for streamlined processing. (See Section 63.18(p).) Note that, if the application is being filed in connection with a sale of assets or reorganization of a carrier or its parent pursuant to the U.S. bankruptcy laws, the application may not be eligible for streamlined processing until final bankruptcy court approval of the proposed sale or reorganization.

Applicant certifies that its responses to questions 21 through 25 are true:

21. The assignee/transferee certifies that it has not agreed to accept special concessions directly or indirectly from a foreign carrier with respect to any U.S. international route where the foreign carrier possesses sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market and will not enter into any such agreements in the future. ☒ Yes ☐ No

22. By signing this application, the undersigned certify either (1) that the authorization(s) will not be assigned or that control of the authorization(s) will not be transferred until the consent of the Federal Communications Commission has been given, or (2) that prior Commission consent is not required because the transaction is subject to the notification procedures for pro forma transactions under Section 63.24 of the rules. The assignee/transferee also acknowledges that the Commission must be notified by letter within 30 days of a consummation or of a decision not to consummate. (See Section 63.24(e)(4).) ☐ Yes ☒ No

23. If this filing is a notification of a pro forma assignment or transfer of control, the undersigned certify that the assignment or transfer of control was pro forma and that, together with all previous pro forma transactions, does not result in a change in the actual controlling party. ☒ Yes ☐ No
☐ Not a Pro Forma

24. The undersigned certify that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.	<input checked="" type="radio"/> Yes <input type="radio"/> No
25. The assignee/transferee certifies that neither it nor any other party to the application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance. See Section 1.2002(b) of the rules, 47 CFR § 1.2002(b), for the definition of "party to the application" as used in this certification.	<input checked="" type="radio"/> Yes <input type="radio"/> No

CERTIFICATION

26. Printed Name of Assignor / Transferor Maskina AS	29. Printed Name of Assignee / Transferee Tower PLC
27. Title (Office Held by Person Signing) CEO	30. Title (Office Held by Person Signing) CEO
28. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files) Kjetil Bohn	31. Signature (Enter the name of the person who will sign the paper version of this form for retention in their files) Hans-Arne L'orange
<p align="center">WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).</p>	

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Answer to Question 10

Section 63.18(c):

Thomas K. Crowe
Law Offices of Thomas K. Crowe, P.C.
1250 24th St., NW
Suite 300
Washington, DC 20037
(202) 263-3640

Please use the above as a contact point to send correspondence concerning the instant notification for both the transferor and transferee.

Section 63.18(d):

Neither the transferor (Maskina AS) nor the transferee (Tower PLC) has previously received authority under Section 214 of the Act.

Explanation of Response to Question No. 11

Presently no individual or entity owns at least ten (10) percent of the equity of the transferee, Tower PLC (a publicly traded company).

However, at the time of the acquisition of 100% of Maskina AS by Tower PLC, the following entity owned at least ten (10) percent of the equity of Tower PLC:

<u>Name/Address</u>	<u>% of Interest</u>	<u>Place of Incorporation</u>	<u>Principal Business</u>
Griffin Group PLC Hilden Park House 79 Tonbridge Road Hildenborough, Kent TN11 9BH United Kingdom	10.59%	UK	Financial Services

No other entity or individual held a ten (10) percent or greater ownership Tower PLC at the time of the transaction.

Answer to Question 13

On June 27, 2005, Tower PLC was conveyed a 100% direct ownership interest in Maskina AS. Maskina AS holds 100% direct ownership of Maskina Communications, Inc.

("Maskina Communications"). Thus, Tower PLC currently holds a 100% indirect ownership interest in Maskina Communications.

Explanation of Response to Question No. 22

In response to Question No. 22 on the attached application for transfer of control, Maskina Communications answered "No".¹ Due to the fact that the subject transaction was consummated on June 27, 2005 Maskina Communications is unable to answer "Yes" to Question No. 22.

Explanation of Response to Question No. 23

This transaction constitutes a *pro forma* transfer of the indirect control of Maskina Communications, an international 214 authorized entity, pursuant to section 63.24(d) of the FCC's Rules. See 47 C.F.R. § 63.24(d). Prior to June 27, 2005, Maskina Communications was wholly owned by Maskina AS. At that time, Maskina AS was controlled by a group of approximately 66 shareholders. As the result of a transaction consummated on June 27, 2005, a 100% ownership interest in Maskina AS was conveyed to Tower PLC. As part of the transaction, the group of shareholders which previously owned 100% of Maskina AS were issued shares in Tower PLC (a publicly traded company) such, on June 27, 2005, that the former Maskina AS shareholders held 67.08% of the ownership in Tower PLC. All shareholders in Maskina AS prior to the Tower PLC acquisition were issued shares in Tower PLC as a result of the transaction. This type of transaction is considered a reverse take-over or reverse merger.

Thus, although a new company, Tower PLC, assumed indirect control over Maskina Communications on June 27, 2005, the single group of shareholders which indirectly controlled Maskina Communications prior to the transaction continued to own an indirect controlling interest in Maskina Communications post-transaction through ownership of Tower PLC. Therefore, the ultimate ownership or control with respect to Maskina Communications was held, before and after the transfer, by the same group of shareholders and the transfer of control was *pro forma*.

¹ Question No. 22 asks "[b]y signing this application, the undersigned certify that either (1) that the authorization(s) will not be assigned or that control of the authorization(s) will not be transferred until the consent of the Federal Communications Commission has been given, or (2) that prior Commission consent is not required because the transaction is subject to the notification procedures for *pro forma* transactions under Section 63.24 of the rules. The assignee/transferee also acknowledges that the Commission must be notified by letter within 30 days of a consummation or of a decision not to consummate. (See Section 63.24(e)(4).)"